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7 Attorney for Jose Manuel Robles

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JOSE MANUEL ROBLES,
15 Defendant.
16

Case No. 2:22-cr-00154-APG-BNW-1

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
20 Witt, Assistant Federal Public Defender, counsel for Jose Manuel Robles, that the previously
21 ordered deadline for filing of pretrial motions be vacated and that the parties herein shall have
22 to and including December 22, 2022, within which to file the Defendant's pretrial motions
23 currently due October 23, 2022.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
25 shall have to and including January 5, 2023, to file any and all responsive pleadings, currently
26 due November 6, 2022.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including January 12, 2023, to file any and all replies to dispositive motions,
3 currently due November 13, 2022.

4 The Stipulation is entered into for the following reasons:

5 1. Since the last stipulation was filed the government produced discovery, and
6 discovery was reviewed by defense counsel.

7 2. Defense counsel needs additional time to thoroughly review discovery materials
8 and discuss this case with Mr. Robles.

9 3. Defense counsel needs additional time to conduct additional investigation, if
10 necessary.

11 4. Mr. Robles is in custody and does not object to the continuance.

12 5. The parties agree to the continuance.

13 6. The additional time requested herein is not sought for purposes of delay, but
14 merely to allow counsel for defendant sufficient time within which to be able to effectively and
15 complete investigation of the discovery materials provided.

1 7. Additionally, denial of this request for continuance could result in a miscarriage
2 of justice. The additional time requested by this Stipulation is excludable in computing the time
3 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
4 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
5 Section 3161(h)(7)(B)(i), (iv).

6 This is the second stipulation to continue filed herein.

7 DATED this 21st day of October 2022.

8 RENE L. VALLADARES
9 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

10 /s/ Jacquelyn N. Witt
11 By _____

 /s/ Robert Knief
 By _____

12 JACQUELYN N. WITT
13 Assistant Federal Public Defender

 ROBERT KNIEF
 Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 JOSE MANUEL ROBLES,

8 Defendant.

Case No. 2:22-cr-00154-APG-BNW-1

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

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10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Since the last stipulation was filed the government produced discovery, and
14 discovery was reviewed by defense counsel.

15 2. Defense counsel needs additional time to thoroughly review discovery materials
16 and discuss this case with Mr. Robles.

17 3. Defense counsel needs additional time to conduct additional investigation, if
18 necessary.

19 4. Mr. Robles is in custody and does not object to the continuance.

20 5. The parties agree to the continuance.

21 6. The additional time requested herein is not sought for purposes of delay, but
22 merely to allow counsel for defendant sufficient time within which to be able to effectively and
23 complete investigation of the discovery materials provided.

24 7. Additionally, denial of this request for continuance could result in a miscarriage
25 of justice. The additional time requested by this Stipulation is excludable in computing the time
26 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United

1 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
2 Section 3161(h)(7)(B)(i), (iv).

3 **ORDER**

4 IT IS THEREFORE ORDERED that the parties herein shall have to and including
5 December 22, 2022 within which to file the Defendant's pretrial motions.

6 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
7 shall have to and including January 5, 2023 to file any and all responsive pleadings.

8 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
9 shall have to and including January 12, 2023 to file any and all replies to dispositive motions.

10 DATED this 24th day of October 2022.

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13 UNITED STATES DISTRICT JUDGE
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